



January 7, 2015

*VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED*

Kathleen Stack
Auto Sales & Wrecking
850 Lakeville Street
Petaluma, CA 94952

Kathleen Stack
Auto Sales & Wrecking
301 Petaluma Blvd.
Petaluma, CA 94952

Re: Notice of Violation and Intent to File Suit under the Clean Water Act

Dear Ms. Stack:

I am writing on behalf of San Francisco Baykeeper ("Baykeeper") to provide you with notice that Baykeeper has cause to file a civil action against you, doing business as Auto Sales & Wrecking ("Auto Sales"), for violations of the federal Clean Water Act, 33 U.S.C. § 1251 *et seq.* ("CWA") at the facility located at 850 Lakeville Street in Petaluma, California (the "Facility"). We intend to file the lawsuit at the end of the 60-day Clean Water Act notice period, which is explained in more detail below, unless we can work with you to find effective remedies for the violations noticed in this letter. Please contact us within the next twenty (20) days so that we may complete discussions before the conclusion of the 60-day notice period. It is our hope that we can resolve these issues so that we can avoid filing a lawsuit at the end of the 60-day notice period.

Baykeeper is a non-profit public benefit corporation organized under the laws of California, with its office in San Francisco, California. Baykeeper's purpose is to protect and enhance the water quality and natural resources of San Francisco Bay, its tributaries, and other waters in the Bay Area, for the benefit of the ecosystems and nearby communities. Baykeeper has over three thousand members who use and enjoy San Francisco Bay, including its northern reaches, and other waters for various recreational, educational, and spiritual purposes. Baykeeper's members' use and enjoyment of these waters are negatively affected by the pollution caused by Auto Sales' operations.

This letter addresses Auto Sales' unlawful discharge of pollutants via stormwater from the Facility to the Petaluma River and San Pablo Bay, a northern portion of San Francisco Bay. Specifically, Baykeeper's investigation of the Facility has uncovered significant, ongoing, and continuous violations of the CWA and the National Pollution Discharge Elimination System ("NPDES") General Permit No. CAS000001 [State Water



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Resources Control Board] Water Quality Order No. 92-12-DWQ, as amended by Order No. 97-03-DWQ ("Industrial Stormwater Permit").¹

CWA section 505(b) requires that sixty (60) days prior to the initiation of a civil action under CWA section 505(a), a citizen must give notice of his or her intent to file suit. 33 U.S.C. § 1365. Notice must be given to the alleged violator, the U.S. Environmental Protection Agency ("EPA"), and the State in which the violations occur. As required by section 505(b), this Notice of Violation and Intent to File Suit provides notice to Auto Sales of the violations that have occurred and which continue to occur at the Facility. After the expiration of sixty (60) days from the date of this Notice of Violation and Intent to File Suit, Baykeeper intends to file suit in federal court against Auto Sales under CWA section 505(a) for the violations described more fully below.

Once again, during the 60-day notice period, Baykeeper hopes to work with you to find effective remedies for the violations noticed in this letter. It is our hope that we can resolve these issues so that we can avoid filing a lawsuit at the end of the 60-day notice period.

I. THE LOCATION OF THE ALLEGED VIOLATIONS

A. The Facility

The Facility is located at 850 Lakeville Street, Petaluma, California. At the Facility, Auto Sales dismantles vehicles for the resale of used parts. Potential pollutants that may come in contact with stormwater include the following: waste oils; waste antifreeze coolant; grease; battery acid and residual lead; sediments; and heavy metals such as aluminum, copper, iron, lead, and zinc. The Facility discharges stormwater into the Petaluma municipal separate storm sewer system ("MS4"), which drains via the Petaluma River to San Pablo Bay, a northern extension of San Francisco Bay.

B. The Affected Waters

San Pablo Bay and the Petaluma River ("Receiving Waters") are waters of the United States. The CWA requires that water bodies such as the Receiving Waters meet water quality objectives that protect specific "beneficial uses." The beneficial uses of San Pablo Bay and the Petaluma River are industrial service supply (Bay only), commercial and sport fishing (Bay only), estuarine habitat, fish migration, navigation, preservation of rare and endangered species, water contact and non-contact recreation, shellfish harvesting (Bay only), fish spawning, cold and warm freshwater habitat (River only), and wildlife habitat. Contaminated stormwater from the Facility adversely affects

¹ On April 1, 2014, the State Water Resources Control Board adopted an updated NPDES General Permit for Discharges Associated with Industrial Activity, Water Quality Order No. 2014-57-DWQ, which has no force or effect until its effective date of July 1, 2015. As of the effective date, Water Quality Order No. 2014-57-DWQ will supersede and rescind the current Industrial Stormwater Permit except for purposes of enforcement actions brought pursuant to the current permit.

these beneficial uses by impairing water quality and threatening the ecosystem of the San Pablo Bay watershed, including significant habitat for listed rare and endangered species.

II. THE ACTIVITIES AT THE FACILITY CONSTITUTE VIOLATIONS OF THE CLEAN WATER ACT

It is unlawful to discharge pollutants to waters of the United States without a NPDES permit or in violation of the terms and conditions of an NPDES permit. CWA § 301(a), 33 U.S.C. § 1311(a); *see also* CWA § 402(p), 33 U.S.C. § 1342(p) (requiring NPDES permit issuance for the discharge of stormwater associated with industrial activities). The Industrial Stormwater Permit authorizes certain discharges of stormwater, conditioned on compliance with its terms.

In 1993, Auto Sales submitted a Notice of Intent ("NOI") to be authorized to discharge stormwater from the Facility under the Industrial Stormwater Permit. However, information available to Baykeeper indicates that stormwater discharges from the Facility have violated several terms of the Industrial Stormwater Permit, thereby violating the CWA. *Id.* The Facility lacks NPDES permit authorization for any discharge of a pollutant into a water of the United States other than discharges that comply with the Industrial Stormwater Permit.

A. Discharges in Excess of BAT/BCT Levels

The Effluent Limitations of the Industrial Stormwater Permit prohibit the discharge of pollutants from the Facility in concentrations above the level commensurate with the application of best available technology economically achievable ("BAT") for toxic pollutants² and best conventional pollutant control technology ("BCT") for conventional pollutants.³ Industrial Stormwater Permit, Order Part B(3). The EPA has published "Benchmark" values that indicate the maximum pollutant concentration present in stormwater discharges when an industrial facility is employing BAT and BCT, as listed in Attachment 1 to this letter.⁴

Auto Sales' self-reported exceedances of Benchmark values over the last five (5) years, identified in Attachment 2 to this letter, indicate that Auto Sales has failed and is failing to employ measures that constitute BAT and BCT in violation of the requirements of the Industrial Stormwater Permit. Baykeeper alleges and notifies Auto Sales that its stormwater discharges from the Facility have contained and continue to contain levels of pollutants that exceed Benchmark values for copper and zinc.

² BAT is defined at 40 C.F.R. § 442.23. Toxic pollutants are listed at 40 C.F.R. § 401.15 and include copper, lead, and zinc, among others.

³ BCT is defined at 40 C.F.R. § 442.22. Conventional pollutants are listed at 40 C.F.R. § 401.16 and include BOD, TSS, oil and grease, pH, and fecal coliform.

⁴ The Benchmark values are part of EPA's Multi-Sector General Permit ("MSGP") and can be found at: http://www.epa.gov/npdes/pubs/msgp2008_finalpermit.pdf. *See* 73 Fed. Reg. 56,572 (Sept. 29, 2008) (Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges From Industrial Activities).

Auto Sales' ongoing discharges of stormwater containing levels of pollutants above EPA Benchmark values and BAT and BCT-based levels of control also demonstrate that Auto Sales has not developed and implemented sufficient Best Management Practices ("BMPs") at the Facility. Proper BMPs could include, but are not limited to, moving certain pollution-generating activities under cover or indoors, capturing and effectively filtering or otherwise treating all stormwater prior to discharge, frequent sweeping to reduce the build-up of pollutants on-site, installing filters in downspouts and storm drains, and other similar measures.

Auto Sales' failure to develop and/or implement adequate pollution controls to meet BAT and BCT at the Facility violates and will continue to violate the CWA and the Industrial Stormwater Permit each and every day Auto Sales discharges stormwater without meeting BAT/BCT. Baykeeper alleges that Auto Sales has discharged stormwater containing excessive levels of pollutants from the Facility into a water of the United States during at least every significant local rain event over 0.1 inches in the last five (5) years.⁵ Attachment 3 compiles all dates in the last five (5) years when a significant rain event occurred. Auto Sales is subject to civil penalties for each violation of the Industrial Stormwater Permit and the CWA within the past five (5) years.

B. Discharges Impairing Receiving Waters

The Industrial Stormwater Permit includes discharge prohibitions and receiving water limitations to protect the water quality of receiving waters. These provisions prohibit stormwater discharges that cause or threaten to cause pollution, contamination, or nuisance (Industrial Stormwater Permit, Order Part A(2)); that adversely impact human health or the environment (*id.* at Order Part C(1)); and that cause or contribute to an exceedance of applicable water quality standards ("WQS") (*id.* at Order Part C(2)).

Applicable WQS are set forth in the California Toxics Rule ("CTR")⁶ and Chapter 3 of the San Francisco Bay Basin (Region 2) Water Quality Control Plan ("Basin Plan").⁷ The Basin Plan establishes both narrative and numeric WQS for San Francisco Bay and its tributaries. The WQS include, but are not limited to, the following:

- Waters shall not contain substances in concentrations that result in the deposition of material that cause nuisance or adversely affect beneficial uses.
- Waters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.

⁵ Significant local rain events are reflected in the rain gauge data available at: <http://www.ncdc.noaa.gov/cdo-web/search>

⁶ The CTR is set forth at 40 C.F.R. § 131.38 and is explained in the Federal Register preamble accompanying the CTR promulgation set forth at 65 Fed. Reg. 31,682 (May 18, 2000).

⁷ The Basin Plan is published by the San Francisco Bay Regional Water Quality Control Board at: http://www.waterboards.ca.gov/sanfranciscobay/basin_planning.shtml#2004basinplan

- Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases from normal background light penetration or turbidity relatable to waste discharge shall not be greater than 10 percent in areas where natural turbidity is greater than 50 NTU.
- All waters shall be maintained free of toxic substances in concentrations that are lethal to or that produce other detrimental responses in aquatic organisms.
- Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use.
- Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use. The Basin Plan, Table 3-3, identifies specific marine water quality objectives for toxic pollutants,⁸ and Table 3-4 identifies specific fresh water quality objectives for toxic pollutants.⁹

Baykeeper alleges that Auto Sales' stormwater discharges do not comply with the discharge prohibitions and receiving water limitations of the Industrial Stormwater Permit. *See* Industrial Stormwater Permit, Order Parts A(2), C(1)-C(2). These allegations are based on Auto Sales' self-reported data submitted to the San Francisco Bay Regional Water Quality Control Board. *See* Attachment 2. In particular, the sampling results for copper and zinc indicate that Auto Sales' discharges exceed applicable numeric WQS.

Baykeeper alleges that each day that Auto Sales has discharged stormwater from the Facility, Auto Sales' stormwater has contained levels of pollutants that violated the Industrial Stormwater Permit, Order Parts A(2) and C(1)-C(2). Baykeeper alleges that these violations have occurred during at least every significant local rain event over 0.1 inches in the last five (5) years. *See* Attachment 3. Each discharge from the Facility that has caused or contributed, or causes or contributes, to a violation of the Industrial Stormwater Permit's discharge prohibition, Order Part A(2), and receiving water limitations, Order Parts C(1)-C(2), constitutes a separate violation of the Industrial Stormwater Permit and the CWA. Auto Sales is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA within the past five (5) years.

⁸ Basin Plan, Table 3-3 is available at:

http://www.waterboards.ca.gov/rwqcb2/water_issues/programs/planningtmdls/basinplan/web/tab/tab_3-03.pdf

⁹ Basin Plan, Table 3-4 is available at:

http://www.waterboards.ca.gov/rwqcb2/water_issues/programs/planningtmdls/basinplan/web/tab/tab_3-04.pdf

C. Failure to Develop and Implement an Adequate Storm Water Pollution Prevention Plan

The Industrial Stormwater Permit requires dischargers to develop and implement an adequate Storm Water Pollution Prevention Plan ("SWPPP"). Industrial Stormwater Permit, Section A(1)(a). The Industrial Stormwater Permit also requires dischargers to make all necessary revisions to existing SWPPPs promptly. *Id.* at Order Part E(2).

The SWPPP must include, among other requirements, the following: a site map, a list of significant materials handled and stored at the site, a description and assessment of all potential pollutant sources, a description of the BMPs that will reduce or prevent pollutants in stormwater discharges, specification of BMPs designed to reduce pollutant discharge to BAT and BCT levels, a comprehensive site compliance evaluation completed each reporting year, and revisions to the SWPPP within 90 days after a facility manager determines that the SWPPP is in violation of any requirements of the Industrial Stormwater Permit. *See* Industrial Stormwater Permit, Section A.

Based on information available to Baykeeper, Auto Sales has failed to prepare and/or implement an adequate SWPPP and/or to revise the SWPPP to satisfy each of the requirements of Section A of the Industrial Stormwater Permit. For example, Auto Sales' SWPPP does not include, and Auto Sales has not implemented, adequate BMPs designed to reduce pollutant levels in discharges to BAT and BCT levels in accordance with Section A(8) of the Industrial Stormwater Permit, as evidenced by the data in Attachment 2.

Accordingly, Auto Sales has violated the CWA each and every day that it has failed to develop and/or implement an adequate SWPPP meeting all of the requirements of Section A of the Industrial Stormwater Permit, and Auto Sales will continue to be in violation every day until it develops and/or implements an adequate SWPPP. Auto Sales is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA occurring within the past five (5) years.

D. Failure to Develop and Implement an Adequate Monitoring and Reporting Program and to Perform Annual Comprehensive Site Compliance Evaluations

The Industrial Stormwater Permit requires facility operators to develop and implement a Monitoring and Reporting Program ("MRP"). Industrial Stormwater Permit, Order Part E(3) and Section B(1). The Industrial Stormwater Permit requires facility operators to collect stormwater samples during two storm events each Wet Season (*id.* at Section B(5)(a)) or, if a facility is a member of an approved group monitoring program, the facility operator must sample during at least two storm events over a five-year period (*id.* at Section B(15)(b)). The Industrial Stormwater Permit also requires that the MRP ensure that each facility's stormwater discharges comply with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations specified in the Industrial Stormwater Permit. *Id.* at Section B(2). Facility operators must ensure that their MRP

practices reduce or prevent pollutants in stormwater and authorized non-stormwater discharges, as well as evaluate and revise their practices to meet changing conditions at the facility. *Id.* This may include revising the SWPPP as required by Section A of the Industrial Stormwater Permit. The MRP must measure the effectiveness of BMPs used to prevent or reduce pollutants in stormwater and authorized non-stormwater discharges, and facility operators must revise the MRP whenever appropriate. *Id.* at Section B(2).

Auto Sales has been operating the Facility with an inadequately-developed and/or inadequately-implemented MRP, in violation of the substantive and procedural requirements set forth in Section B of the Industrial Stormwater Permit. First, Auto Sales has failed to sample its stormwater discharges as required by the Industrial Stormwater Permit. Auto Sales is a member of an approved group monitoring program. Thus, the Facility must sample its stormwater at least twice in the past five-year period. However, in the past five years, Auto Sales has only sampled once, a violation of the Industrial Stormwater Permit.

Moreover, the sampling data in Attachment 2 indicates that Auto Sales' monitoring program has not ensured that stormwater discharges are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations of the Industrial Stormwater Permit as required by Section B(2). The monitoring program has not resulted in practices at the Facility that adequately reduce or prevent pollutants in stormwater as required by Section B(2). Similarly, the sampling data in Attachment 2, as well as the Facility's sampling results prior to the last five years, indicate that Auto Sales' MRP has not effectively identified or responded to compliance problems at the Facility or resulted in effective revision of BMPs in use or the Facility's SWPPP to address such ongoing problems as required by Section B(2).

In addition, Auto Sales' MRP is inadequate because Auto Sales has not collected stormwater samples that adequately reflect pollution coming from its industrial activities. Section B(7)(a) of the Industrial Stormwater Permit requires Auto Sales to "collect samples of storm water discharges from all drainage areas that represent the quality and quantity of the facility's storm water discharges." Section B(5)(c)(ii) requires facilities to sample for "[t]oxic chemicals and other pollutants that are likely to be present in storm water discharges in significant quantities." Section B(5)(c)(iii) of the Industrial Stormwater Permit requires facilities to sample for the specific analytical parameters listed in Table D of the Industrial Stormwater Permit. For automobile salvage yards, like Auto Sales, these parameters include TSS, iron, lead, and aluminum. Yet Auto Sales has not sampled for aluminum or iron in its discharges. Because Auto Sales failed to monitor for aluminum and iron, it has failed to comply with Sections B(5)(c) and B(7)(a) of the Industrial Stormwater Permit.

As a result of Auto Sales' failure to adequately develop and/or implement an adequate MRP at the Facility, Auto Sales has been in daily and continuous violation of the Industrial Stormwater Permit and the CWA each and every day for the past five (5) years. These violations are ongoing. Auto Sales will continue to be in violation of the monitoring and reporting requirements each day that Auto Sales fails to adequately

develop and/or implement an effective MRP at the Facility. Auto Sales is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA occurring for the last five (5) years.

E. Discharges Without Permit Coverage

Section 301(a) of the CWA prohibits the discharge of any pollutant into waters of the United States unless the discharge is authorized by a NPDES permit issued pursuant to section 402 of the CWA. *See* 33 U.S.C. §§ 1311(a), 1342. Auto Sales sought coverage for the Facility under the Industrial Stormwater Permit, which states that any discharge from an industrial facility not in compliance with the Industrial Stormwater Permit "must be either eliminated or permitted by a separate NPDES permit." Industrial Stormwater Permit, Order Part A(1). Because Auto Sales has not obtained coverage under a separate NPDES permit and has failed to eliminate discharges not permitted by the Industrial Stormwater Permit, each and every discharge from the Facility described herein not in compliance with the Industrial Stormwater Permit has constituted and will continue to constitute a discharge without CWA permit coverage in violation of section 301(a) of the CWA, 33 U.S.C. § 1311(a).

IV. PERSONS RESPONSIBLE FOR THE VIOLATIONS

Katherine Stack, doing business as Auto Sales & Wrecking, is the person responsible for the violations at the Facility described above.

V. NAME AND ADDRESS OF NOTICING PARTY

Our name, address, and telephone number is as follows:

San Francisco Baykeeper
785 Market Street, Suite 850
San Francisco, CA 94103
(415) 856-0444

VI. COUNSEL

Baykeeper is represented by the following counsel in this matter, to whom all communications should be directed:

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George Torgun, Managing Attorney
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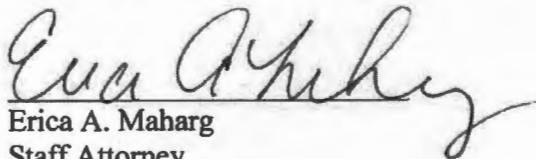
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VII. REMEDIES

Baykeeper intends, at the close of the 60-day notice period or thereafter, to file a citizen suit under CWA section 505(a) against Auto Sales for the above-referenced violations. Baykeeper will seek declaratory and injunctive relief to prevent further CWA violations pursuant to CWA sections 505(a) and (d), 33 U.S.C. § 1365(a) and (d), and such other relief as permitted by law. In addition, Baykeeper will seek civil penalties pursuant to CWA section 309(d), 33 U.S.C. § 1319(d), and 40 C.F.R. § 19.4, against Auto Sales in this action. The CWA imposes civil penalty liability of up to \$37,500 per day per violation for violations occurring after January 12, 2009. 33 U.S.C. § 1319(d); 40 C.F.R. § 19.4. Baykeeper will seek to recover attorneys' fees, experts' fees, and costs in accordance with CWA section 505(d), 33 U.S.C. § 1365(d).

As stated above, Baykeeper is hoping to discuss and agree upon effective remedies for the violations noted in this letter during the 60-day notice period. We look forward to working with you to resolve these issues. Please contact either George Torgun or me at your earliest convenience so that we may initiate these discussions.

Sincerely,



Erica A. Maharg
Staff Attorney
San Francisco Baykeeper

Cc:

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Attachment 1: EPA Benchmarks and Numeric Water Quality Standards

A. EPA Benchmarks (MSGP¹)

Parameter	Units	Benchmark value	Source
Total Suspended Solids	mg/L	100	MSGP
Aluminum Total	mg/L	0.75	MSGP
Iron Total	mg/L	1.0	MSGP
Lead Total	mg/L	0.095*	MSGP
Zinc Total	mg/L	0.13*	MSGP
Copper Total	mg/L	0.0156*	MSGP

* Assuming a water hardness range of 100-125 mg/L

B. Numeric Freshwater Quality Standards (Basin Plan,² Table 3-4)

Parameter	Units	Water Quality Standard	Source
Copper Total	mg/L	0.013*	Basin Plan
Zinc Total	mg/L	0.12*	Basin Plan

* 1-hour average, assuming a water hardness level of 100 mg/L

¹ "MSGP" is the EPA's Multi-Sector General Permit ("MSGP"), which can be found at: http://www.epa.gov/npdes/pubs/msgp2008_finalpermit.pdf. See 73 Fed. Reg. 56,572 (Sept. 29, 2008) (Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges From Industrial Activities).

² The "Basin Plan" is published by the San Francisco Bay Regional Water Quality Control Board at: http://www.waterboards.ca.gov/sanfranciscobay/basin_planning.shtml#2004basinplan.

Attachment 2:
Table of Exceedances for Auto Sales & Wrecking

Table containing each stormwater sample which exceeds EPA Benchmarks, numeric water quality standards (WQS), or both. The EPA Benchmarks and numeric WQS are listed in Attachment 1. All stormwater sampling results were collected and reported by the Facility during the past five years.

No.	Sampling Date	Parameter		Value	Units	Wet Season	Exceeds Bench-mark	Exceeds Numeric WQS
1	2/16/2011	Total Suspended Solids	=	190	mg/L	2010-2011	✓	
2	2/16/2011	Oil & Grease	=	26	mg/L	2010-2011	✓	
3	2/16/2011	Copper Total	=	0.24	mg/L	2010-2011	✓	✓
4	2/16/2011	Lead Total	=	0.19	mg/L	2010-2011	✓	✓
5	2/16/2011	Zinc Total	=	0.87	mg/L	2010-2011	✓	✓
6	11/20/2013	pH	=	5.8	pH units	2013-2014	✓	✓
7	11/20/2013	Oil & Grease	=	28	mg/L	2013-2014	✓	
8	11/20/2013	Copper Total	=	0.15	mg/L	2013-2014	✓	✓
9	11/20/2013	Zinc Total	=	0.3	mg/L	2013-2014	✓	✓
10	11/20/2013	Aluminum Total	=	1.2	mg/L	2013-2014	✓	
11	11/20/2013	Iron Total	=	2.4	mg/L	2013-2014	✓	

Attachment 3: Alleged Dates of Violations by Auto Sales & Wrecking January 8, 2010 to December 31, 2014

Days with precipitation one-tenth of an inch or greater, as reported by NOAA's National Climatic Data Center; Petaluma 1.3 SW, CA US Station, GHCND:US1CASN0062.

See <http://www.ncdc.noaa.gov/cdo-web/search>.

2010	2011	2012	2013	2014
1/12	1/1	1/23	1/6	2/2
1/13	1/2	2/7	1/24	2/3
1/14	1/14	2/13	2/20	2/6
1/17	1/30	2/29	3/6	2/7
1/18	1/31	3/13	3/7	2/27
1/19	2/14	3/14	4/2	2/28
1/20	2/15	3/15	4/4	3/1
1/21	2/16	3/24	4/5	3/4
1/22	2/17	3/25	4/8	3/6
1/23	2/18	3/27	5/28	3/26
1/24	2/19	3/28	9/21	3/27
1/25	2/25	3/31	9/22	3/29
1/26	3/2	4/1	11/20	3/30
1/30	3/3	4/11	12/7	4/1
2/5	3/6	4/12		4/25
2/6	3/7	4/13		4/26
2/9	3/14	4/25		9/25
2/13	3/16	10/22		10/25
2/22	3/24	10/23		11/1
2/24	3/25	11/1		11/13
3/2	3/26	11/9		11/20
3/3	4/21	11/17		11/21
3/4	4/24	11/18		11/22
3/10	4/25	11/20		11/29
3/13	5/15	11/21		11/30
3/25	5/16	11/28		12/1
3/30	5/17	12/16		12/2
3/31	5/18	12/17		12/3
4/1	5/26	12/26		12/4
4/3	5/29			12/5
4/5	5/31			12/6
4/12	6/2			12/11
4/13	6/4			12/12
4/20	6/5			12/13
4/27	6/28			12/15
4/28	6/29			12/16
4/29	10/11			12/17
5/11	11/6			12/18
5/18	11/11			

[illegible]

